

# Law Offices of Colin Mulholland

Employment and Civil Litigation

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Honorable Analisa Torres  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
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Re: Modragon v. Mike Mini Mart and Deli Corp., et al.  
20-cv-682

Your Honor,

I represent the Plaintiff in this matter and I write to respectfully request that the Court permit Plaintiff to submit his default motion on or before October 16<sup>th</sup>, 2020 and to adjourn sine die any initial conference unless or until the Defendants make an appearance.

Sadly, due to the pandemic and unique medical issues, Mr. Modragon has been forced by circumstances to move to Mexico. As such, it has become a more difficult to contact him and to prepare and execute the declaration necessary for a default motion.

If it pleases the Court, the undersigned would respectfully request additional time to coordinate with Mr. Modragon to prepare the default motion that has become necessary at this point.

This is the Plaintiff's first request for an extension of time.

GRANTED. By **October 16, 2020**, Plaintiff shall file his motion for default judgment. The initial pretrial conference scheduled for October 1, 2020 is ADJOURNED *sine die*.

SO ORDERED.

Dated: September 21, 2020  
New York, New York



ANALISA TORRES  
United States District Judge

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